



June 9, 2020

VIA ECF

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Hon. Vera M. Scanlon
United States Magistrate Judge
United States District Court for the Eastern
District of New York
225 Cadman Plaza East, 1214 South
Courtroom 13A—South Wing
Brooklyn, NY 11201

Re: *Monadnock Construction, Inc. v. Westchester Fire Ins. Co./Westchester Fire Ins. Co. v. Glasswall, LLC, et al.*, Case No.: 1-16-cv-00420-JBW-VMS

Dear Judge Scanlon:

We represent Westchester Fire Insurance Company and file this short status report on behalf of all parties. The parties reached agreement on, and have now filed, a stipulated order under which Westchester will produce unredacted attorney time and payment records while not waiving applicable privileges and immunities. The parties also will be submitting a confidentiality order to protect confidential material produced by the parties.

Separately, the parties are working toward a potential mediation, likely using the Eastern District of New York's mediation services. If so, the parties expect to submit a request for a revised schedule that includes a short extension of the discovery schedule so that the parties can first concentrate on the mediation process before additional depositions occur. The parties hope to update the Court this week or early next week.

Respectfully,

COZEN O'CONNOR

By: s/ John J. Sullivan